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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

13 IT IS HEREBY STIPULATED AND AGREED between the undersigned attorneys, that this  
14 Court issue an Order protecting from disclosure to the public any discovery documents containing the  
15 personal identifying information such as social security numbers, drivers license numbers, dates of  
16 birth, or addresses, of victims in this case. Such documents shall be referred to hereinafter as  
17 "Protected Documents." The parties state as follows:

18       1.     Protected Documents which will be used by the United States in its case in chief  
19 include personal identifiers, including social security numbers, drivers license numbers, dates of birth,  
20 and addresses, of the victims in this case. In addition, many of these documents may include personal  
21 identifiers that defendant may choose to use as evidence in this case.

22        2. The United States agrees to provide Protected Documents without redacting the  
23 personal identifiers of victims, with the possible exception of 302 reports, memoranda of interview  
24 and tax records that it reserves the right to produce in redacted form

25       3. Access to Protected Documents by defendant will be restricted to personnel authorized  
26 by the Court, namely defendant, attorneys of record and attorneys, paralegals, investigators, experts.

1 and secretaries employed by the attorneys of record and performing services on behalf of defendant.

2 As such, the following restrictions will be placed on defendant, defendant's attorney and the above-  
3 designated individuals unless and until further ordered by the Court. Defendant, defendant's attorney  
4 and the above-designated individuals shall not:

5 a. make copies for, or allow copies of any kind to be made by any other person  
6 of Protected Documents, or allow the Protected Documents to be otherwise disseminated;

7 b. allow any other person to read Protected Documents; and

8 c. use Protected Documents for any other purpose other than preparing to defend  
9 against the charges in the Indictment or any further superseding indictment arising out of this case.

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11 4. Defendant shall not retain any copies of the Protected Documents. If defendant creates  
12 any notes that contain any personal identifiers received from the Protected Documents, then  
13 defendant's attorney shall retain such notes for defendant.

14 5. Defendant's attorney shall inform any person to whom disclosure may be made  
15 pursuant to this order of the existence and terms of this Court's order.

16 6. The requested restrictions shall not restrict the use or introduction as evidence of  
17 discovery documents containing personal identifying information such as social security numbers,  
18 drivers license numbers, dates of birth, and addresses during the trial of this matter.

19 7. Upon conclusion of this litigation, defendant's attorney shall return to counsel for the  
20 United States, or destroy and certify to counsel for the United States, the destruction of all

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1 discovery documents containing personal identifying information such as social security numbers,  
2 drivers license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty  
3 days after defendant has exhausted all appellate rights or rights under 18 U.S.C. 2255.

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5 DANIEL BOGDEN  
United States Attorney

6   
7 MICHAEL CHU  
8 Assistant U.S. Attorney

9   
10 JONATHAN POWELL, Esq.  
11 Counsel for defendant

12 DATE

13 4-25-13

14 DATE

15 4-25-13

16 **ORDER**

17 IT IS SO ORDERED this 6th day of May, 2013

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19 UNITED STATES MAGISTRATE JUDGE

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